

ALICE C. KUGLER, ET AL \* NO. 19,251 EQUITY  
 VS. \* IN THE CIRCUIT COURT FOR  
 MARY E. OTT, ET AL \* FREDERICK COUNTY, MARYLAND

\* \* \* \* \*

**THE ANSWER OF ETHEL WELTY GELWICKS, DEFENDANT**

Answering the Bill of Complaint, your Respondent says:

1. Answering the FIRST paragraph of said Bill, your Respondent says that she believes that the allegations thereof are probably true.

2. Answering the SECOND paragraph of said Bill of Complaint, your Respondent says that the said J. Bernard Welty died a resident of Frederick County, Maryland, on or about the 25th day of December, 1957, leaving a last will and testament which was duly probated by the Orphans' Court of Frederick County on December 30, 1957 and recorded in Liber H.D.R. No. 3, Folio 381, one of the Will Records of Frederick County, a certified copy of which said will is filed with the Bill of Complaint and marked "Complainants' Exhibit No. 3." That by the terms of the said will, the said J. Bernard Welty devised to your Respondent, Ethel Welty Gelwicks, who was the niece of the said J. Bernard Welty, "my home where I now live at 19 and 21 West Main Street, Emmitsburg." And your Respondent further says that by the terms of the said will, the said J. Bernard Welty devised "to my nephew, Tyson J. Welty, my home farm of about 165 acres located on the Keysville Road this being the same property which I secured from James B. Elder." And your Respondent says that William Sanders and Ida Sanders, his wife, Respondents named in the said Bill, are and since about the year 1948 have been tenants on the said farm devised by the will of J. Bernard Welty to Tyson J. Welty, and your Respondent admits that the remaining Respondents are heirs at law of the said Marie Celeste Welty, deceased, but your Respondent is without information as to whether the Respondents named in the Bill are all of the heirs of the said Marie Celeste Welty, or not.